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12
13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 JOVITA SALVADOR,

16 Plaintiff,

17 vs.

18 CAPITAL ONE, INC., CAPITAL ONE
19 AUTO FINANCE., NORDSTROM, INC.,
20 WELLS FARGO HOME MORTGAGE,
INC., and EQUIFAX INFORMATION
SERVICES, LLC,

21 Defendants.

22 CASE NO. 2:15-cv-01200-APG-NJK

23 **STIPULATION AND PROPOSED
24 ORDER TO FILE AMENDED
25 COMPLAINT**

26 Plaintiff Jovita Salvador (“Plaintiff”) and Defendant Wells Fargo Bank, N.A., erroneously
27 named as Wells Fargo Home Mortgage (“Wells Fargo,” together with Plaintiff, the “Parties”), by
28 and through their respective attorneys, hereby stipulate to allow Plaintiff to file First Amended
Complaint (“FAC”) as follows:

29 WHEREAS, on June 24, 2015, Plaintiff filed her Complaint;

1 WHEREAS, on January 25, 2016, Plaintiff filed her Motion to Amend/Correct Complaint,
2 ECF No. 40 (“Motion”);

3 WHEREAS, the Parties agree to allow Plaintiff to file the amended complaint, attached
4 hereto as Exhibit A, rendering the Motion moot;

5 WHEREAS, Wells Fargo is the only remaining defendant in this case as Plaintiff has
6 substantively settled with Nordstrom;

7 WHEREAS, the deadline to dismiss Nordstrom as a defendant is March 30, 2016;

8 WHEREAS, this request is not made for purposes of delay and is supported by good
9 cause;

10 NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS
11 HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

12 1. The Motion is withdrawn;

13 2. Plaintiff shall file the Amended Complaint, attached hereto as Exhibit A, within
14 five days of this Court’s Order;

15 3. Wells Fargo shall file a response to the Amended Complaint within thirty (30)
16 days thereafter.

17 **IT IS SO STIPULATED.**

18 DATED March 9, 2016.

19
20 KAZEROUNI LAW GROUP, APC

SNELL & WILMER L.L.P.

21 By: /s/ Michael Kind

22 Michael Kind, Esq.
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Attorneys for Plaintiff

By: /s/ Karl O. Riley

Karl O. Riley, Esq.
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*Attorneys for Defendant Wells Fargo
Bank, N.A. erroneously named as Wells
Fargo Home Mortgage*

ORDER

IT IS ORDERED THAT the Motion to Amend/Correct Complaint, ECF No. 40, is hereby withdrawn;

IT IS FURTHER ORDERED THAT Plaintiff shall file the Amended Complaint, one day attached hereto, within ~~five~~ days of this Order.

IT IS FURTHER ORDERED THAT Wells Fargo shall file a response to the Amended
14 days
Complaint within ~~thirty~~ (30) days thereafter.

IT IS SO ORDERED.

DATED: March 10 2016.

UNITED STATES MAGISTRATE JUDGE